

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04 CV 10746 JLT

IVAN SANTIAGO,
Plaintiff

v.

WILLIAM J. FEENEY, MARCUS
EDDINGS
Defendants

**DEFENDANT MARCUS EDDINGS’
PROPOSED REQUESTED VOIR DIRE OF THE JURY**

The Defendant Marcus Eddings (“Defendant”) hereby requests that this Honorable Court conduct the following *voir dire* of the jury pool. If any juror answers these questions in the affirmative, the Defendant requests that those jurors be individually questioned regarding their impartiality as jurors:

1. Have you, or has any member of your immediate family and/or close friends been employed by the Boston Police Department or by any law enforcement agency?
2. Have you or any member of your immediate family ever been involved in a lawsuit against a police officer, a law enforcement agency, and/or one of its employees?
3. Would you be less likely to credit the testimony of a witness if that witness was a law enforcement officer?
4. Would you be influenced by any media accounts of instances of police misconduct?
5. Have you or any member of your immediate family and/or close friend ever had any negative experience in dealing with any police officer or other law enforcement official?
6. Have you or any member of your immediate family and/or close friend ever been the subject of a law enforcement official’s investigation?

7. Do you or any member of your immediate family and/or close friend have a criminal record?
8. Do you or any member of your immediate family and/or close friend harbor any ill feelings toward law enforcement as a profession?
9. Have you or any member of your immediate family and/or close friend been the victim of a crime?
10. Have you or any member of your immediate family and/or close friend belong to any civic, political or other organization that is concerned with civil rights or liberties reform?
11. Have you, or has any member of your immediate family, ever filed a complaint of police misconduct against any law enforcement officer?

Respectfully submitted,
DEFENDANT MARCUS EDDINGS
By his attorney:

/s/ Helen G. Litsas
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Helen G. Litsas, BBO# 644848
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electric Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 5, 2006.

/s/ Helen G. Litsas
Helen G. Litsas